



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 24, 2023

**By ECF**

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States of America v. Heidi Hong Piao,*  
23 Civ. 04027 (ER)**

Dear Judge Ramos:

This Office represents the United States of America (the “Government”) in the above-referenced action. I write respectfully pursuant to this Court’s Electronic Case Filing Rule 21.7(b) to request that the Court seal the original complaint the Government filed in this action and the exhibits thereto, filed on May 15, 2023, Dkt. No. 1. The reason for this request is that the version of Exhibit 3 that was attached to the initial complaint, Dkt. No. 1-3, contains personal identifiable information that was inadvertently not redacted before filing.

Upon discovering this error shortly after filing the complaint, I contacted the Court’s ECF Help Desk to request that Exhibit 3 be temporarily sealed, which was done. In addition, as advised by the ECF Help Desk, I re-filed the complaint and exhibits, with a properly redacted version of Exhibit 3. *See* Dkt No. 4.

I thank the Court for its attention to this matter.

The application to permanently seal Exhibit 3 to the complaint, Doc. 1-3, is granted.  
SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 5/25/2023

New York, New York

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

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cc: Heidi Hong Piao (via Email and First-Class Mail)